

November 19, 2002

Via Certified Mail/Return Receipt Requested

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency,
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: CERCLA § 104(e) Request for Information
Lower Darby Creek Area Superfund Site - Clearview Landfill,
Folcroft Landfill and Folcroft Landfill Annex

Dear Ms. Prisk:

The following responses correspond numerically to "Enclosure F" of the EPA's CERCLA Section 104(e) request to John B. Stetson Company ("the Company") for information regarding the above Sites. Mr. Nishitani kindly agreed to allow the Company to have until November 22, 2002 to respond.

1. John B. Stetson Company
175 E. Main Street
Suite 202
Mt. Kisco, NY 10549
Telephone: 914-666-2568
 - a. Incorporated in the State of Delaware, March 1966
 - b. Same as above
 - c. None

2. Up until approximately February 1971, the Company maintained a hat manufacturing operation at 5th Street and Montgomery Avenue in Philadelphia, which was the site of the original hat manufacturing plant established by John B. Stetson in 1865. Based, however, on declining demand for hats in the United States, the Company, in February 1971, discontinued its hat manufacturing operations. Through January 1984, the Company was engaged in the business of licensing its trademarks. During this period, though it no longer manufactured the hats for which it was famous, western headwear continued to bear the Stetson name through a trademark licensing agreement with Stevens Hat Company ("Stevens") of St. Joseph, Missouri. In addition, the Company entered into other licensing arrangements for use of its trademarks on products other than hats, including fragrances and eyewear. In 1984, the Company acquired its principal headwear licensee, Stevens, and reentered the hat manufacturing business, operating from the St. Joseph, Missouri facility. The Company subsequently suffered losses that led to its seeking protection under Chapter 11 of the Bankruptcy Code in June of 1986. In December of 1987, the Company sold all of its hat manufacturing operations to RHE, Inc. As a condition of the sale, the Company retained its trademark rights, licensed certain of its trademarks to RHE for use in RHE's hat manufacturing operations. In February of 1988, the Company emerged from its Chapter 11 proceedings as a re-organized company, engaged solely in the licensing of its trademarks, which it does to this date, out of its offices in New York.
3. There are no current officers or directors who have any knowledge of the operations and waste disposal practices during the dates in question. To the best of the Company's knowledge, any former employees who might have known about the operations and waste disposal practices during that time frame are deceased. No current employees have any personal knowledge about the Company's past manufacturing operations or waste disposal practices at the Philadelphia facility between 1958 and 1976.

Ms. Carlyn Winter Prisk (3HS11)

Page 3

November 19, 2002

4. a & b. Please refer to paragraphs 2 and 3 above.
 - c. In responding to this Request for Information, the Company searched all of its files located in its Mt. Kisco, New York offices. In addition, the Company searched its files that are archived in a Bekins storage facility in Atchinson, Kansas. The Company found no documents responsive to this Request.
5. Please refer to paragraph 4.c. above.
6. Please refer to paragraphs 2-5 above.
7. Please refer to paragraphs 2-5 above.
- 8-9. The Company has no knowledge about or documents relating to contracting for removal or waste disposal or making arrangements with any of the entities listed in paragraph 8 of the Request for Information. The only relevant document the Company has is the October 31, 1973 purchase order that was attached to the Request for Information. The date of that invoice is more than 2 ½ years after the Company ceased its manufacturing operations in Philadelphia.
10. Please refer to paragraphs 3-5 and 8-9 above.
11. Please refer to paragraphs 3-5 and 8-9 above.
12. The Company has no knowledge of any spills or releases of any substances on any portion of the Sites identified.
13. The Company has no knowledge of the identities of any employees responsible for arranging for the removal or disposal of wastes or paying for those activities during the relevant time period.

Ms. Carlyn Winter Prisk (3HS11)

Page 4

November 19, 2002

14. The Company is not aware of ever conducting any environmental assessments or investigations of the Sites identified in the Request.
15. The Company has no knowledge or information responsive to this Request.
16. Richard A. Adler
Vice President and Chief Operating Officer
John B. Stetson Company
175 E. Main Street – Ste. 202
Mt. Kisco, NY 10549
Telephone: 914-666-2568
17. The Company is not aware of when any documents solicited by this Request were destroyed. Nor does the Company know what its document retention policy was during the years 1958 through 1976. At present, the Company has no formal document retention policy.

Sincerely,



Richard A. Adler
Vice President and COO

RAA/je

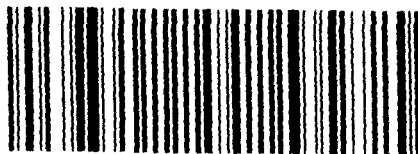
cc: Philip J. Katauskas, Esquire
Brian Nishitani, Esquire



JOHN B. STETSON COMPANY

175 East Main Street, Suite 202
Mt. Kisco, New York 10549

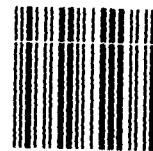
CERTIFIED MAIL



7099 3400 0021 1501 9816



9264



19103

U.S. POSTAGE
PAID
MOUNT KISCO, NY
10549
NOV 19, 02
AMOUNT

\$4.65

00025029-03

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

19103+2029 01

